

EXHIBIT H

From: [Innessa M. Huot](#)
To: [Nicole E. Price](#); [Alex J. Hartzband](#)
Cc: [Mary Ellen Donnelly](#)
Subject: RE: Ruderman v. Law Office of Yuriy Prakhin - Subpoena
Date: Friday, February 19, 2021 4:56:19 PM

Nicole,

As an initial matter, we would like to remind you of Defendants' continued obligation to produce any records obtained in response to Defendants' subpoenas and HIPAA requests as they are generated/provided to Defendants. Your comment about Defendants not being obligated to produce T-Mobile's response to your subpoena is inaccurate and Defendants' withholding such records is troubling.

To date no records at all have been produced in response to the various subpoenas Defendants issued to T-Mobile and Plaintiff's prior law firm – Mallilo and Grossman. Likewise, Defendants have yet to produce any records which they presumably received in response to the HIPAA forms which Plaintiff executed.

Your note about AT&T being in possession of the records you seek is not accurate. Since you will not provide the communications you are legally obligated to provide to us, we have reached out directly to both carriers. We expect a response from them on Monday and will confer with the client and respond to your request promptly thereafter – likely by end of day on Tuesday.

Best,
Innessa

From: [Innessa M. Huot](#)
To: [Nicole E. Price](#)
Subject: T-Mobile/AT&T
Date: Tuesday, February 23, 2021 4:22:14 PM
Attachments: [image001.png](#)
[image002.png](#)

Hi Nicole, the carriers contacted me yesterday during the hearing but the employees had already left by the time I tried to call them back afterwards. I tried to contact them again today but could not get through. They typically call back within 24 hours so I expect a call back tomorrow. I will let you know.

Thank you,
Innessa



Innessa M. Huot | Partner | Faruqi & Faruqi, LLP | 685 3rd Avenue, 26th Floor | New York, NY 10017 | (T) 212-983-9330 | (F) 212-983-9331 | www.faruqilaw.com | www.employeerightscounsel.com



This message originates from the law firm of Faruqi & Faruqi, LLP. This email message and all attachments may contain legally privileged and confidential information intended solely for the use of the addressee. If you are not the intended recipient, you should immediately stop reading this message and delete it from your system. Any unauthorized reading, distribution, copying or other use of this message or its attachments is strictly prohibited. All personal messages express solely the sender's view and not those of Faruqi & Faruqi, LLP. This message may not be copied or distributed without this disclaimer. If you received this message in error, please reply to the sender above immediately and permanently delete this message from your inbox.